



1 Van E. Flury
2 4009 W. Kiva Street
3 Laveen, Arizona 85339
4 (602) 237-9152, (602) 319-8777

5 Plaintiff, Pro Per

6 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

7
8 VAN E. FLURY, an individual,

9 Plaintiff,

10 vs.

11 CSC CREDIT SERVICES, INC. (an Ohio
12 foreign corporation,)

13 DEALER SERVICES CORPORATION
14 (a Delaware corporation;)

15 Defendants.

CASE NO.

CIV '11 1166 PHX DKO

COMPLAINT

(Fair Credit Reporting Act)

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17 **JURISDICTION AND VENUE**

18 1) Plaintiff alleges the Court's jurisdiction of this matter pursuant to a Federal
19 Question: the cause of action alleged against defendants arising under the laws of the
20 United States, pursuant to the: *Fair Credit Reporting Act*, ("FCRA") U.S.C. Title 15,
21 *section, 1681 et seq.*

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23 2) Plaintiff further alleges that the plaintiff, Van E. Flury, at all times material to this
24 action, resides in: Maricopa County, Arizona, at: 4009 W. Kiva Street, Laveen, Arizona
25 85339.

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27 3) Plaintiff further alleges that co-defendant, "CSC CREDIT SERVICES, INC." has its
28 principal place of business located at: 100 Tri- County Parkway, Suite 350,

1 Springdale/Cincinnati, OH 45246; and an Ohio registered agent, to wit: CT Corporation,
2 1300 East 9th Street, Cleveland, OH 44114.

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4 4) Plaintiff further alleges that co-defendant, "DEALER SERVICES CORPORATION"
5 has its principal place of business located at: 1320 City Center Drive, Suite 100, Carmel,
6 IN 46032; and an Arizona registered/statutory agent, to wit: CT Corporation System, 2394
7 East Camelback Road, Phoenix, AZ 85016.

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9
10 **COMPLAINT**

11 5) Plaintiff further alleges that the defendants collectively violated the provision of the
12 "*Fair Credit Reporting Act*" U.S.C. Title 15, §1681b(a,) with regards to the plaintiff, Van
13 E. Flury, in that they obtained the plaintiff's separate consumer credit reports from
14 Experian, Trans Union, and Equifax (i.e. made 3 hard inquiries into) on: 5/26/2011, and a
15 additional 4th (hard inquiry) into Trans Union again on: 6/1/2011 - without a permissible
16 purpose in all the 4 instances alleged - pursuant to: U.S.C. Title 15, §1681b(a.)

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18 **PRAYER FOR RELIEF AND DEMAND FOR JUDGMENT**

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20 6) Plaintiff demands a Jury Trial in this matter.

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22 7) Plaintiff demands relief and judgment as follows:

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24 a) Against both defendants jointly and/or severally for plaintiff's actual damages
25 (pursuant to: U.S.C. Title 15, §1681n) in the matter in the amount of \$10,000. (the facts of
26 which to be proven at trial) for their willful noncompliance with the "*Fair Credit*
27 *Reporting Act.*"

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Complaint - Fair Credit Reporting Act.

1 b) Or, in the alternative - against both defendants jointly and/or severally: statutory
2 damages pursuant to *U.S.C. Title 15, §1681n*, in the amount of \$4,000. (being \$1,000. per
3 alleged violation) for their willful noncompliance with the "*Fair Credit Reporting Act.*"
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5 8) Plaintiff also claims his "Costs" in the action.
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10 DATED this 13th day of June 2011

11
12 By : 
13 Van E. Flury (pro per)

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